

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:	§	
	§	
STANDCO INDUSTRIES, INC.	§	CASE NO. 10-37364-H4-11
	§	Chapter 11
Debtor.	§	

**CHRISTIAN DI FERRANTE, VINOD KEWALRAMANI, UR PROPERTIES I, LTD.,
AND WWW.URBAN,INC.'S MOTION FOR LEAVE TO UNCONDITIONALLY
DEPOSIT FUNDS INTO THE REGISTRY OF THE COURT**

[This Motion Relates to Dkt. No. 362]

**To the Honorable Jeff Bohm,
Chief United States Bankruptcy Judge:**

CHRISTIAN DI FERRANTE, VINOD KEWALRAMANI, UR PROPERTIES I, LTD.,
and WWW.URBAN, INC. file this their *Motion for Leave to Unconditionally Deposit Funds
Into the Registry of The Court* for the use and benefit of the Debtor, STANDCO INDUSTRIES,
INC. pursuant to Rule 67 of the Federal Rules of Civil Procedure and would respectfully show as
follows:

1. This matter is currently pending before this Court upon an Advisory pleading filed by the Debtor related to UR Properties I, Ltd. purchase of property owned by the Debtor. The Court has been hearing testimony and receiving evidence concerning a variety of issues related to that transaction over the course of the past 9 months.
2. At the conclusion of the hearings and receipt of evidence this Court expressed concern that the Debtor's Estate had potentially been harmed in the amount of \$177,000 as a result of a variety of actions and omissions and invited all concerned to consider voluntarily making payments in light of the Court's expressed concerns.

3. In consideration of the Court's comments, CHRISTIAN DI FERRANTE, VINOD KEWALRAMANI, UR PROPERTIES I, LTD., and WWW.URBAN, INC. seek an Order granting them leave to jointly deposit the sum of ONE HUNDRED TWENTY-FIVE THOUSAND AND NO/100 DOLLARS (\$125,000.00) into the Registry of this Court for the unconditional use and benefit of STANDCO INDUSTRIES, INC.

WHEREFORE, PREMISES CONSIDERED, CHRISTIAN DI FERRANTE, VINOD KEWALRAMANI, UR PROPERTIES I, LTD., and WWW.URBAN, INC. jointly move this court to enter an Order granting them leave to unconditionally deposit the sum of ONE HUNDRED TWENTY-FIVE THOUSAND AND NO/100 DOLLARS (\$125,000.00) into the Registry of this Court for the unconditional use and benefit of STANDCO INDUSTRIES, INC.

Respectfully submitted,
JACKSON WALKER L.L.P.

/s/ Bruce J. Ruzinsky

Bruce J. Ruzinsky
Texas State Bar No. 17469425
1401 McKinney Street, Suite 1900
Houston, Texas 77010
713.752.4200
713.308.4184 – Fax

**ATTORNEYS FOR CHRISTIAN DI
FERRANTE, VINOD KEWALRAMANI, UR
PROPERTIES I, LTD, and WWW.URBAN,
INC.**

-and-

WILSON, ELSER, MOSKOWITZ, EDELMAN &
DICKER, LLP.

/s/ Jeffrey L. Hoffman

Jeffrey L. Hoffman
Texas State Bar No. 09781770
Jeff.hoffman@wilsonelser.com
909 Fannin, Suite 3300
Houston, Texas 77010-1011

(713) 353-2000
(713) 785-7780 – Fax
**ATTORNEYS FOR CHRISTIAN DI
FERRANTE**

-and-

BROWN & KORNEGAY, LLP

/s/ Nancy R. Kornegay
Nancy R. Kornegay
Texas State Bar No. 24032641
2777 Allen Parkway, Suite 977
Houston, Texas 77019
nkornegay@bklp.com
(713) 528-3700
(713) 528-3701 – Fax
**ATTORNEYS FOR VINOD
KEWALRAMANI, UR PROPERTIES I, LTD.,
and WWW.URBAN, INC.**

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing instrument was served by Certified Mail, Return Receipt Requested, regular mail and/or by electronic transmission to all registered users of ECF appearing in this case, on February 16, 2015 upon the following counsel-of record:

Leonard H. Simon
Robert Pendergraft
PENDERGRAFT & SIMON
The Riviana Building
2777 Allen Parkway, Suite 800
Houston, Texas 77019

/s/ Bruce J. Ruzinsky